

ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of

Amendment of Section 73.622(i)  
Post-Transition Table of Allotments,  
Digital Television Broadcast Stations  
(Greenville, North Carolina)

)  
)  
) MB Docket No. \_\_\_\_\_  
) RM- \_\_\_\_\_  
)

To: Office of the Secretary  
Attn: Chief, Video Division  
Media Bureau

FILED/ACCEPTED

FEB - 3 2012

Federal Communications Commission  
Office of the Secretary

**SUPPLEMENT TO PETITION FOR RULE MAKING  
TO AMEND THE TABLE OF DTV ALLOTMENTS**

By its attorneys and pursuant to Sections 1.401, 73.616, and 73.622(a) of the Commission's Rules,<sup>1</sup> Media General Communications Holdings, LLC ("Licensee"), licensee of WNCT-TV, Greenville, North Carolina (the "Station"), hereby submits this Supplement to the Petition for Rule Making filed on May 4, 2011, to provide information demonstrating how Licensee's proposal advances the public interest.

In the Petition, Licensee requested that the Commission institute a rulemaking to amend Section 73.622(i), the Post-Transition Table of DTV Allotments, by substituting Channel 45 as the Station's allotment in lieu of Channel 10. The Petition explained that, by changing from VHF Channel 10 to UHF Channel 45, Licensee would be able to more meaningfully replicate the Station's traditional analog service area and provide more reliable service for viewers within the Station's service area.

With this Supplement, Licensee provides additional information demonstrating that operation on Channel 45 would enhance the Station's service area and, thus, serve the public

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interest. As shown in the attached Technical Statement, according to the Commission's OET-69 model, operation on Channel 45 will allow the Station to serve approximately 124,723 more viewers than the Station currently is able to serve with its facilities on Channel 10. Moreover, although the noise limited contours for Channels 10 and 45 show a small loss area, viewers in that loss area will remain well served. Only 806 viewers in the loss area will not be able to access another CBS affiliate over the air. The increase in service to 124,723 viewers far exceeds the loss that might be experienced by 806 viewers.<sup>2</sup>

For the reasons set forth in the Petition and this Supplement, Licensee respectfully requests that the Commission amend the Post-Transition Table of DTV Allotments as proposed. As noted initially, adoption would serve the public interest by permitting the Station to provide a more meaningful replication of service. In addition, because this proposal would enhance the Station's service area, Licensee respectfully requests that the Commission find that good cause exists under Section 553(d)(3) of the Administrative Procedures Act (5 U.S.C. § 553(d)(3)) to make this change effective immediately upon publication in the Federal Register of a Report and Order in this proceeding.<sup>3</sup>

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<sup>1</sup> 47 C.F.R. §§ 1.401, 73.616, 73.622(a).

<sup>2</sup> *KNTV License, Inc.*, 19 FCC Rcd 15479, 15485 n.11 (MB 2004) ("We are less concerned about the withdrawal of service here [to 21,170 viewers], because the vast majority of the people located within the loss area will continue to receive NBC network service from other NBC affiliates, and are also well served by other stations.").

<sup>3</sup> *See, e.g., Ann Arbor, Michigan*, 24 FCC Rcd 10856, 10857 (MB 2009) ("An expedited effective date is necessary in this case to ensure that station WPXD-TV can provide improved service to its market as quickly as possible."). *See also Bismark, North Dakota*, 24 FCC Rcd 7534 (MB 2009); *St. Paul, Minnesota*, 24 FCC Rcd 8953 (MB 2009); *Bryan, Texas*, 24 FCC Rcd 4867 (MB 2009).

Respectfully submitted,

MEDIA GENERAL COMMUNICATIONS  
HOLDINGS, LLC

By



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of

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Its Attorneys

Dated: February 3, 2012

## **ATTACHMENT A**

### **Technical Exhibit**

SUPPLEMENT TO TECHNICAL EXHIBIT  
PETITION FOR RULE MAKING TO  
MODIFY THE DTV TABLE OF ALLOTMENTS  
STATION WNCT-TV  
GREENVILLE, NORTH CAROLINA

This Supplement to the Technical Exhibit was prepared on behalf of television station WNCT-TV assigned to Greenville, North Carolina in support of a *Petition for Rule Making* to modify the DTV allotment of WNCT-TV to substitute UHF channel 45 for the current VHF channel 10 DTV allotment.

Figure 1 is a map showing the predicted noise limited contours for the present and proposed WNCT-TV digital television operations. The extent of the contours is calculated using the FCC's standard prediction method along 36 evenly spaced radials with a 3 second digitized terrain database. The predicted 36 dBu contour is shown for the present WNCT-TV operation on channel 10 (35 kW-ND, 575 m), and the predicted 41 dBu contour is shown for the proposed WNCT-TV operation on channel 45 (1000 kW-ND, 575 m). As shown on Figure 1, the proposed WNCT-TV channel 45 contour substantially replicates the present channel 10 contour.

Although, as shown in Figure 1, the present WNCT-TV contour appears slightly larger than the proposed contour, the proposed WNCT-TV operation on channel 45 will actually provide service to a greater population than the present operation. Figure 3 is a printout from the FCC's OET-69 computer program that calculates the service population for the present WNCT-TV operation using the OET-69 model and the 2000 US Census. As shown, the present WNCT-TV service population is 1,334,505 people. Figure 4 is a similar showing for the proposed WNCT-TV operation on channel 45 (1,459,228 people). The proposed WNCT-TV operation on channel 45 is calculated to provide service to 124,723 more people than the present WNCT-TV operation on channel 10.

The following are estimates of the population (2000 US Census) within the 2 predicted noise limited contours shown on Figure 1.

Present WNCT Ch.10, 36 dBu	1,648,119 people
Proposed WNCT Ch.45, 41 dBu	<u>1,516,196</u> people
Predicted loss area	131,923 people

Station WNCT-TV is a CBS television network affiliate. Figure 2 is a map showing the present and proposed WNCT noise limited contours, and the contours for other CBS television network affiliates providing service to the predicted loss area. The following are the other CBS television network affiliates shown on Figure 2.

WRAL-TV, Ch.48, Raleigh, NC.

WILM-LD, Ch.40, Wilmington, NC.

WBTW, Ch.13, Florence, SC.

WBTW-DR, PRM, Ch.41, Florence, SC.

WTKR, Ch.41, Norfolk, VA.

As shown on Figure 2, there is a small, narrow area near the east coast that is predicted to lose WNCT CBS network service. The estimated population within this small loss area is 806 people.

John A. Lundin

du Treil, Lundin & Rackley, Inc.

201 Fletcher Avenue

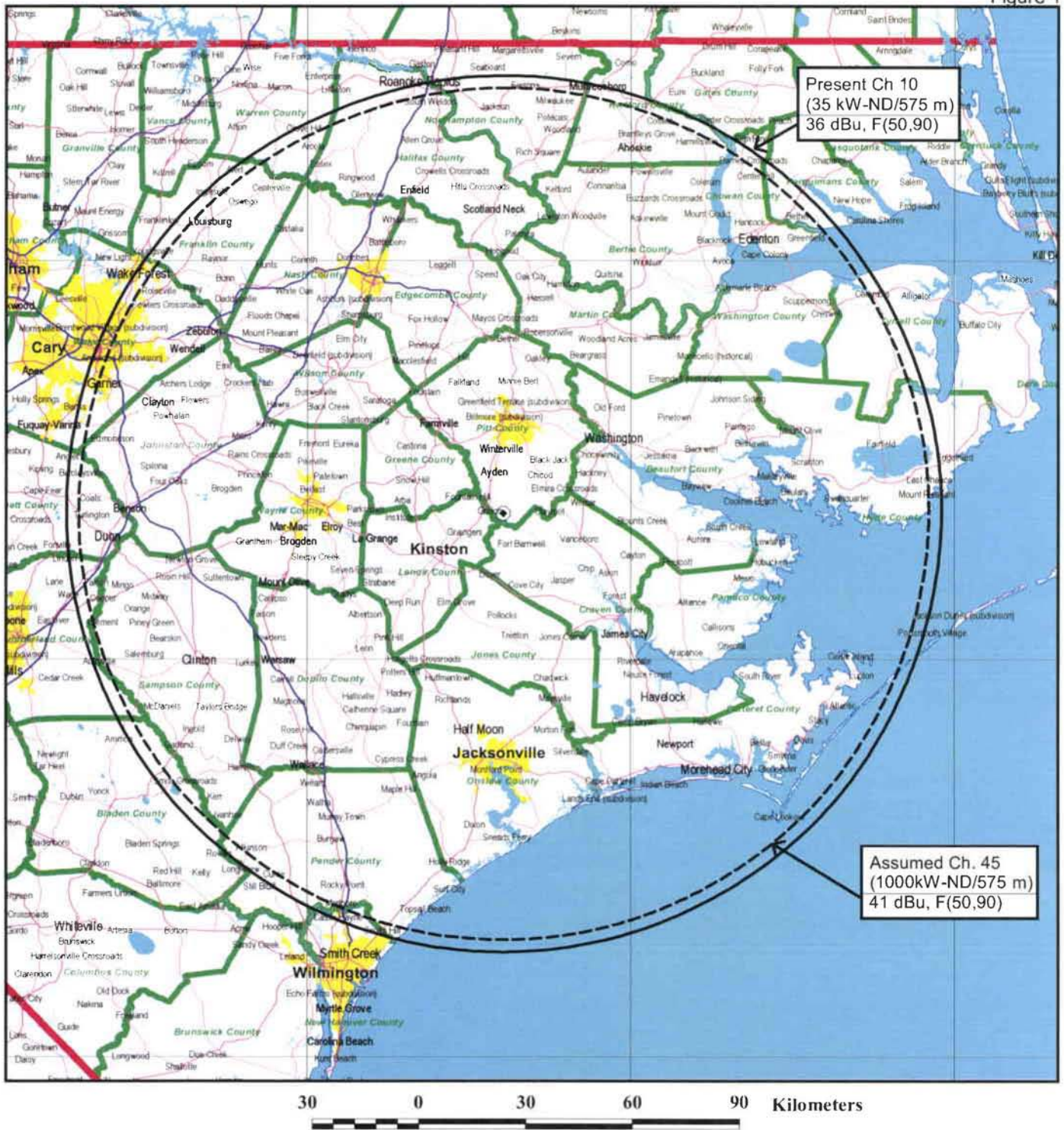
Sarasota, Florida 34237

(941) 329-6011

February 2, 2012



Figure 1



## FCC PREDICTED NOISE-LIMITED COVERAGE CONTOURS

DTV STATION WNCT-TV  
GREENVILLE, NORTH CAROLINA

du Treil, Lundin & Rackley, Inc. Sarasota, Florida



Figure 2



## OTHER CBS NETWORK SERVICES TO WNCN PREDICTED LOSS AREA

duTreil, Lundin & Rackley, Inc. Sarasota, Florida



Percent allowed new interference: 0.500  
Percent allowed new interference to non Class A LPTV: 2.000  
TW Census data selected 2000  
Data Base Selected  
/export/home/cdbs/pt\_tvdb.sff  
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 01-31-2012 Time: 12:08:32

Record Selected for Analysis

WNCT-TV BLCDT -20110504ACA GREENVILLE NC US  
Channel 10 ERP 35. kW HAAT 00575 m RCAMSL 00585 m  
Latitude 035-21-55 Longitude 0077-23-38  
Status LIC Zone 2 Border Site number: 01  
Last update 00000000 Cutoff date 00000000 Docket  
Comments  
Applicant MEDIA GENERAL COMMUNICATIONS HOLDING

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility (site # 01) meets maximum height/power limits

Site number 1			
Azimuth	ERP	HAAT	36.0 dBu F(50,90)
(Deg)	(kW)	(m)	(km)
0.0	35.000	567.6	122.1
45.0	35.000	575.0	122.7
90.0	35.000	579.7	123.0
135.0	35.000	579.3	123.0
180.0	35.000	572.3	122.5
225.0	35.000	579.4	123.0
270.0	35.000	572.2	122.5
315.0	35.000	570.6	122.3

Evaluation toward Class A Stations from site # 01

No Spacing violations or contour overlap  
to Class A stations from site # 01

Class A Evaluation Complete

Checks to Site Number 01

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quiet zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

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# Analysis of Interference to Affected Station 7

## Analysis of current record

Channel	Call	City/State	Application	Ref. No.
10	WNCT-TV	GREENVILLE NC	BLCDT	-20110504ACA

## Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref. No.
09	WSKY-TV	MANTEO NC	161.6	LIC	BLCDT	-20100514ADM
09	WHMC	CONWAY SC	222.1	LIC	BLEDT	-20090622ADN
10	WIS	COLUMBIA SC	336.6	LIC	BLCDT	-20090624ABZ
10	WSWP-TV	GRANDVIEW WV	426.5	APP	BDSTA	-20080225AGT
10	WSWP-TV	GRANDVIEW WV	426.5	LIC	BLEDT	-20100210AAQ
11	WTVD	DURHAM NC	108.4	LIC	BLCDT	-20100929AGW

Total scenarios = 1

Result key: 1  
Scenario 1 Affected station 7  
Before Analysis

Results for: 10A NC GREENVILLE BLCDT 20110504ACA LIC  
HAAT 575.0 m, ATV ERP 35.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1644127	47331.5
not affected by terrain losses	1628009	47199.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	293504	2650.6
lost to ATV IX only	293504	2650.6
lost to all IX	293504	2650.6
Service Population	1334505	

## Potential Interfering Stations Included in above Scenario 1

9A NC MANTEO	BLCDT	20100514ADM	LIC
10A SC COLUMBIA	BLCDT	20090624ABZ	LIC
11A NC DURHAM	BLCDT	20100929AGW	LIC

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Percent allowed new interference: 0.500  
Percent allowed new interference to non Class A LPTV: 2.000  
TW Census data selected 2000  
Data Base Selected  
/export/home/cdbs/pt\_tvdb.sff  
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 01-31-2012 Time: 11:59:18

Record Selected for Analysis

WNCT-DR BPRM -20110504ADB GREENVILLE NC US  
Channel 45 ERP 1000. kW HAAT 00575 m RCAMSL 00585 m  
Latitude 035-21-55 Longitude 0077-23-38  
Status APP Zone 2 Border Site number: 01  
Last update 00000000 Cutoff date 00000000 Docket  
Comments  
Applicant MEDIA GENERAL COMMUNICATION HOLDINGS

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility (site # 01) does not meet maximum height/power limits  
Channel 45 ERP = 1000.00 HAAT = 575.

Site number 1			
Azimuth	ERP	HAAT	41.0 dBu F(50,90)
(Deg)	(kW)	(m)	(km)
0.0	1000.000	567.6	118.8
45.0	1000.000	575.0	119.2
90.0	1000.000	579.7	119.4
135.0	1000.000	579.3	119.4
180.0	1000.000	572.3	119.0
225.0	1000.000	579.4	119.4
270.0	1000.000	572.2	119.0
315.0	1000.000	570.6	118.9

Evaluation toward Class A Stations from site # 01

No Spacing violations or contour overlap  
to Class A stations from site # 01

Class A Evaluation Complete

Checks to Site Number 01

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quiet zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance



Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

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# Analysis of Interference to Affected Station 8

## Analysis of current record

Channel	Call	City/State	Application	Ref. No.
45	WNCT-DR	GREENVILLE NC	BPRM	-20110504ADB

## Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
44	WECT	WILMINGTON NC	155.1	LIC	BLCDT	-20081031ABJ
45	WJPM-TV	FLORENCE SC	246.0	LIC	BLEDT	-20090622ADM
46	WWAY	WILMINGTON NC	155.1	LIC	BLCDT	-20051221AOQ
46	WPXV-TV	NORFOLK VA	179.2	LIC	BLCDT	-20020510AAI

Total scenarios = 1

Result key: 1  
Scenario 1 Affected station 8  
Before Analysis

Results for: 45A NC GREENVILLE BPRM 20110504ADB APP

HAAT 575.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1474156	43650.8
not affected by terrain losses	1469354	43626.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	10126	626.7
lost to ATV IX only	10126	626.7
lost to all IX	10126	626.7

Service Population 1459228

## Potential Interfering Stations Included in above Scenario 1

44A NC WILMINGTON	BLCDT	20081031ABJ	LIC
45A SC FLORENCE	BLEDT	20090622ADM	LIC
46A NC WILMINGTON	BLCDT	20051221AOQ	LIC

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